

EXHIBIT A

Popovitch & Popovitch, LLC
Daniel S. Popovitch, Esq.
1601 Bay Avenue
PO Box 27
Point Pleasant, New Jersey 08742
Attorney for Plaintiff

JUN 24 2010

Debra G. Meyer and
Warren C. Meyer

Plaintiff (s)

vs.

TARGET CORPORATION

Defendant

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION / OCEAN COUNTY

DOCKET NO.:

2451.10

CIVIL ACTION

COMPLAINT and JURY DEMAND

Plaintiffs, Debra G. Meyer and Warren C. Meyer residing at 1415 George Street,
Point Pleasant, Ocean County, New Jersey by way of complaint states:

FIRST COUNT

1. On June 28, 2008, Plaintiff was lawfully on the premises of the owned by the Defendant, Target Store, located at 520 Route 70, Brick, New Jersey.
2. Plaintiff was caused to fall when she slipped on an unknown substance in an aisle open to the public.
3. Defendant was negligent in that it failed to properly maintain the aisles and area open to the public, allowed slippery substances to come into contact with and remain on the floor which the Defendant knew or should have known of, created a dangerous condition and an unreasonable risk of harm to customers in the store and failed to warn plaintiff of such condition.

4. As a result of the negligence of the defendant as set forth above, plaintiff sustained and suffered severe and permanent injuries which now and in the future will require medical treatment in order to effect a cure thereof, together with other economic losses.

WHEREFORE, Plaintiff Debra G. Meyer demands judgment on this Count against the defendant for damages together with interest and cost of suit.

SECOND COUNT

1. Plaintiff repeats each and every allegation of the First Count as though set forth herein verbatim.

2. The Plaintiff, Warren C. Meyer is the husband of the Plaintiff, Debra G. Meyer, and was deprived of the services and consortium of the Plaintiff as a result of the negligence of the Defendant.

WHEREFORE, Plaintiff, Warren Meyer demands judgment on this Count against the Defendants for damages together with interest and cost of suit.

JURY DEMAND


Plaintiff does hereby demand trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

DANIEL S. POPOVITCH is hereby designated as trial counsel for the Plaintiff in the within matter pursuant to R.4:25-4.

Popovitch & Popovitch, LLC

By:


DANIEL S. POPOVITCH, ESQ.


Dated: 

CERTIFICATION

In accordance with R.4:5-1, I hereby certify that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding contemplated. I also certify that at this time, there is no other party who should be joined in this action.


POPOVITCH & POPOVITCH, LLC
Attorney for Plaintiff

BY:


DANIEL S. POPOVITCH, ESQ.

Dated: 6/23/10

Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
 <p>Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</p>		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
		CHG/CK NO.	
		AMOUNT:	
		OVERPAYMENT:	
		BATCH NUMBER:	
ATTORNEY / PRO SE NAME Daniel S. Popovitch, Esq.		TELEPHONE NUMBER (732) 295-1600	COUNTY OF VENUE OCEAN
FIRM NAME (if applicable) POPOVITCH & POPOVITCH, LLC		DOCKET NUMBER (when available) 82451.10	
OFFICE ADDRESS 1601 Bay Avenue Point Pleasant, New Jersey 08742		DOCUMENT TYPE Complaint & Jury Demand	
NAME OF PARTY (e.g., John Doe, Plaintiff) Debra G. Meyer & Warren C. Meyer		CAPTION Debra G. Meyer & Warren C. Meyer vs. Target Corporation	
CASE TYPE NUMBER (See reverse side for listing) 605	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) Sedgwick CMS, Inc. <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE DANIEL S. POPOVITCH, ESQ.			

Effective 04/01/2010, CN 10517-English

page 1 of 2

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)
- 999 OTHER (Briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603 AUTO NEGLIGENCE - PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- 280 Zelnorm
- 285 Stryker Trident Hip Implants
- 288 Prudential Tort Litigation

Mass Tort (Track IV)

- | | |
|---------------------------------------|--|
| 248 CIBA GEIGY | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 282 FOSAMAX |
| 271 ACCUTANE | 283 DIGITEK |
| 272 BEXTRA/CELEBREX | 284 NUVARING |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 286 LEVAQUIN |
| 275 ORTHO EVRA | 287 YAZ/YASMIN/OCELLA |
| 277 MAHWAH TOXIC DUMP SITE | 601 ASBESTOS |
| 278 ZOMETHA/AREXIA | 619 VIOXX |
| 279 GADOLINIUM | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category

☐ Verbal Threshold☐ Putative Class Action☐ Title 59

Attorney(s) DANIEL S. POPOVITCH, ESQ.
 Office Address 1601 Bay Avenue
PO Box 27
 Town, State, Zip Code Point Pleasant, New Jersey 08742
 Telephone Number (732) 295-1600
 Attorney(s) for Plaintiff Debra G. & Warren C. Meyer

Debra G. Meyer & Warren C. Meyer

Plaintiff(s)

Vs.

Target Corporation

Defendant(s)

Superior Court of New Jersey

Ocean COUNTY
LAW DIVISION

Docket No: L2451-10

CIVIL ACTION SUMMONS

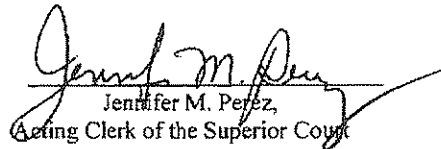
From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: 7-8-2010


 Jennifer M. Perez,
 Acting Clerk of the Superior Court

Name of Defendant to Be Served: The Corporation Trust Company

Address of Defendant to Be Served: 820 Bear Tavern Road, West Trenton, NJ 08628

NOTE: The Case Information Statement is available at <http://www.njcourtsonline.com>